

P. O. BOX 190
1703 E. SECOND STREET
SCOTCH PLAINS, NEW JERSEY 07076
(201) 322-5783

January 27, 1986

Ms. Janet C. Feldstein
Environmental Engineer
N. J. Investigation & Compliance
E.P.A. - Region II
26 Federal Plaza
New York, New York 10278

Re: SCP Carlstadt
216 Paterson Plank Road
Carlstadt, N.J.

REVISED WORK PLAN

1. Sampling of the four tanks and one tanker will be conducted on February 3, 1986 at 8:00 A.M. by Inland Pollution Service, Inc. The procedure will be for a Supervisor and technician to sample at various levels using a bomb sampler for liquids and a grab sampler for solids. They will be equipped with P.C.B. resistant suits and gloves and full face respirators. They will also have absorbent pads to catch any spillage. The analysis of the samples will be than taken to a state certified laboratory.
2. Disposal method will be incineration of the liquids and an option of landfill or incineration of the sludge, depending on the P.C.B. analysis after the samples are taken.
3. E.P.A. will have final approval of any treatment or disposal facility to be used.
4. Procedures for disposal of visibly contaminated soils immediately around P.C.B. tanks were any previous leakage or spillage may have occurred from such tanks will be to shovel up visibly contaminated solid and place directly into a tank that has had its liquids removed. Shovelled contaminated soil will be disposed of with sludge.
5. The emergency numbers will be posted in the office where access to the phone will be available during the hours of operation on site.

South Bergen Hospital	201-288-0880
Hackensack Hospital	201-441-2000
Passaic General Hospital	201-365-4300
 Carlstadt Police Dept.	 201-438-4300
Carlstadt Fire Dept.	201-438-4300
 E.P.A. Metro Region	
(Andrew Tynan)	201-648-2075
Bergen Environmental Inspector	
(Carol Wagner)	201-261-8008

345762



6. Enclosed is Chemical Waste Management, Inc.'s Spill Response and Control Plan.

7. All personnel working on site will be equipped with the following personal protective devices.

- Tyvex coveralls
- Chemical Resistant Gloves
- Chemical Resistant Boots
- Hard hat
- Safety glasses or goggles
- Respirators

All personnel will wash off boots and gloves prior to entering the office.

All personnel safety gear will remain on site.

All vehicles prior to leaving site, after being in work area, will have their tires washed on the decon pad.

8. Inmar will have a representative responsible for locking/unlocking the gates each day work is performed on site.

9. Drip pans will be placed under each hose coupling location.

10. The schedule of events for the duration of the project is as follows:

	0	1	2	3	4
1. Sampling of tanks					
2. Liquid removal					
3. Mobilization of Equipment					
Sludge removal					
Demobilization of Equipment					
4. Decon tanks					
5. Cutting & removal of tanks					

CHEMICAL WASTE MANAGEMENT, INC.

ENRAC Division

SCPP - General Remedial Projects

Spill Response and Control

The ENRAC operations may involve some transfers of liquids from containers (drums) to either interim bulk storage tanks or directly to bulk liquid transport vehicles. These transfers, coupled with the questionable integrity of the encountered drums, require guidelines for safe and practical response to hazardous waste spills.

Although all such transfers will take place within the bermed drum handling area, ENRAC will develop a specific spill response program to be implemented at the initiation of this surface remedial action and continued throughout the duration of ENRAC's involvement at the site. This program will address all phases of materials which may be encountered.

Concurrent to the clean-up activities, the Site Safety Officer, on-site Chemist and Project Manager will evaluate the magnitude of any spillage and determine if the degree of resultant hazard warrants work stoppage. The PRP's Representative will be informed of any situation as soon as possible.

In the event of an incident, the Site Safety Officer will determine the extent of the problem. He will record the nature of the chemicals involved, if a determination is possible. A fingerprint analysis may be necessary and, if so, it will be performed immediately. If he decides that site evacuation is required, he will implement the worksite evacuation system.

If necessary, he will make arrangements to obtain special equipment to contain and cleanup the spill. The Site Safety Officer will determine the potential for fire associated with the spill and if neighborhood evacuation is necessary.

Once the basic determinations have been made, the Spill Response Coordinator directs the spill response. Contact with the material will be avoided and proper safety precautions will be followed. Personnel will wear protective clothing and equipment for the particular chemical hazards involved.

Spill response equipment will be present on-site and operational in case of a spill. This equipment shall include: heavy equipment, vacuum trucks, fire suppressants, overpack drums, absorbent materials and a variety of hand tools.

In the event of a solid spill, the material will be appropriately placed into an overpack or other suitable container. The contaminated area surrounding the spill will either be neutralized and/or excavated. The spread of contaminated dust will be prevented by covering or wetting the material, depending upon the size and nature of the spill.

Upon completion of the cleanup, the Site Safety Officer will complete an incident report conforming to the CWM incident reporting procedure. The report will include a description of the spill (i.e., what spilled, how, etc.), size of the spill, action taken (including equipment and methods used), local entities contacted, and personnel involved. The report will be signed by the Site Safety Officer and reviewed and signed by the Project Manager.

Copies of the report will be distributed according to CWM incident reporting procedures. A file of incident reports will be maintained on-site.

In the event of a liquid spill, the appropriate response members will contain the liquid using surrounding soil, cover materials or appropriate absorbent. The goal of this containment is to minimize the movement and spread of contamination. Once the liquid has been contained, recontainer-izing the material to drums or to a vacuum truck or absorbing the material into a solid will be performed. The contact soils will either be excavated and/or neutralized as determined by the Spill Response Coordinator and Project Manager.

CWM/ENRAC

Incident Report

DATE: / /

TIME:

PROJECT:

LOCATION OF SPILL:

DESCRIPTION OF SPILL:

ACTION TAKEN:

PERSONNEL INVOLVED:

EQUIPMENT INVOLVED:

SPILL REPORTED TO:

AUTHORIZATIONS:

Spill Response Coordinator

Client Representative

Project Manager

Other Authorized Signature

Control No.

CHEMICAL WASTE MANAGEMENT, INC.

NATIONAL TRANSPORTATION

EMERGENCY RESPONSE PLAN

PURPOSE

This plan has been developed to facilitate quick and effective response to a transportation emergency involving the spill of hazardous waste.

SCOPE

This plan establishes a transportation emergency response coordinator for each of the three CWM regions. It designates his authority and responsibility in the event of a spill. There is a framework established for reporting spills at various levels, obtaining a pre-qualified emergency response company, arranging for clean-up, obtaining technical assistance, and filing of reports.

The ERP is broken into 7 sections.

- I. Driver Emergency Response Procedures
- II. Initial Notification
- III. Communications
- IV. Response to Scene
- V. Clean-up Activities
- VI. Transportation
- VII. Reporting

The degree of action taken will be dependent upon the severity of the spill, however, these 7 steps are fundamental to all spills without consideration of the magnitude.

The following is a listing of the activities which will take place during each step.

I. Driver Emergency Response Procedure

Drivers responsibilities in the event of an emergency

1. Park the unit in the most secure area available, away from homes, traffic, waterways, or businesses.
2. Never abandon truck or disconnect trailer unless told to do so by the proper authorities or where there is immediate danger which would affect the cargo.
3. Protect the scene.
 - a. Request a passer-by to notify police if radio contact cannot be made.
 - b. Set out flags or reflectors.
 - c. Warn all persons to keep away (minimum distance 500 feet, actual distance to be determined by the DOT emergency response guidebook).
 - d. Protect manifest, paperwork, instructional materials, and equipment (mask, gloves, suits, respirator, etc) for later use.

4. After some authority arrives notify your dispatcher or supervisor providing the following information.
 - a. Proper shipping name, hazard class, and ID number of materials
 - b. CWM profile number(s)
 - c. Exact location
 - d. Quantity of material spilled
 - e. Location and distance to any streams, rivers, or lakes
 - f. Nature and extent of any injuries or property damage
 - g. Name of government agencies on the scene
 - h. Weather conditions
 - i. A telephone number where communications with the scene can be established
 - j. An estimate of what response and clean-up will be needed
5. Dress in protective clothing with mask and respirator before approaching unit. If the nature of the spill allows you to safely take action, you may attempt to dike the area, place a plastic liner down to collect the material or otherwise respond to the emergency. Do not attempt to enter a closed unit or handle waste materials without qualified assistance.
6. Maintain communications with your supervisor at a maximum of 30 minute intervals, where possible, unless otherwise instructed.

7. Speak only to properly identified authorities. Do not speak to news or TV reporters.
8. Stay on the scene until relieved by a CWM employee.

II. Initial Notification

The initial notice that a CWM unit has been involved in a spill may originate from any number of sources. Contacts might be received from a local law enforcement agency, fire department, Chemtrec, a CWM driver, or some other party. The CWM representative receiving the call or notification must obtain essential and accurate information. The following are the minimum items to obtain:

- a. Name of party calling
- b. Phone number of party calling
- c. Date and time of call
- d. Exact location of incident
- e. Shipping name, hazard class, UN number and CWM profile number of material spilled and manifest number
- f. Type of unit
- g. Quantity of waste on unit
- h. Type of container
- i. Amount spilled
- j. Geographic area, ie; rural, urban, waterway, culvert, etc.
- k. Weather conditions
- l. Generator name and location

- m. Nature of any injuries
- n. Name of agencies on scene
- o. Other details

The caller, if a CWM employee, should be advised to maintain phone communications from the incident scene to the CWM response coordinator.

The person taking the call will immediately contact the regional transportation emergency response coordinator (ERC) in the region where the spill occurred (see attached map). All information obtained will be relayed to the regional coordinator. Normally the regional coordinator will be the first party contacted.

III. Communications

The transportation emergency response coordinator (ERC) in the region where the spill occurred has primary responsibility and authority for all emergency response to spills which involve a CWM transportation vehicle.

Upon notification that a spill has occurred, the ERC will call the reporting party and obtain complete details regarding the spill. Enough information must be obtained to develop initial emergency response actions. Communications with the scene must be developed at this time. After obtaining essential details

on the spill, the ERC must make contact with the regional manager, the regional health and safety manager, the lab, an ENRAC technical specialist and the transportation manager whose unit was involved in the spill.

Information regarding the spill must be assembled at this time. The minimum information on hand must include:

1. The profile sheet
2. A DOT emergency response guide
3. Spill control guide
4. The CWM national emergency response plan
5. A map of the geographic area where the spill occurred

The ERC should create a team that will coordinate the spill response. The team on major incidents could include the (ERC), a chemist, an ENRAC representative, a health and safety specialist.

IV. Response to the Spill

It is imperative that the response to the spill scene be quick and effective. In order to facilitate quick response to the scene, arrangements have been made with outside emergency response companies in various geographic areas. (see list attached). The use of these response companies will depend on the nature, severity and location of the spill. The ERC should select the response company that can provide the most effective response, contact that company, advise them of the nature and

scope of the spill, and dispatch them to the scene.

Once this is accomplished, at least 2 CWM employees will also respond to the scene to represent our interests. At least one of these should be an ENRAC technical representative. The on scene employees are responsible for keeping the ERC advised of the situation.

V. Clean-up Activities

As soon as possible after the immediate emergency situation is brought under control, the removal and disposal of spilled material should be planned and initiated. The company who responded to the emergency will not necessarily perform the clean-up. This will depend on CWM's capability and the nature of the spill. The decision on clean-up will be made by the ERC. It is necessary to consider the following when planning clean-up activity.

- a. Location of disposal facility which can accept material.
- b. Availability of containers to package the waste.
- c. The weather conditions.
- d. ENRAC capabilities in the area.
- e. The hazards involved in various handling methods.

VI. Transportation

During the response to any spill, it is necessary to consider how the material will be moved from the spill scene to an approved disposal location. There are a number of factors which must be considered in selecting a carrier.

- a. Type of unit needed, i.e., dump, tank, van, etc.
- b. Availability and location of CWM equipment.
- c. The cost and expertise of locally available carriers.

When a carrier is selected, the response coordinator must assure that the company holds the necessary state and US EPA waste transporter permits as well as state motor carrier authorities and minimum financial responsibility.

Any carrier used should be under obligation to CWM by use of the standard transportation contract for outside haulers, and be on the "Qualified Subhauler List".

**FEDERAL
EXPRESS**USE THIS AIRBILL FOR DOMESTIC SHIPMENTS AND FOR SHIPMENTS TO PUERTO RICO TO THE U.S.A.
FILL OUT PURPLE AREAS. FOR ASSISTANCE, CALL 800-238-5355 TOLL FREE.
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS.

SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER

DATE

52038

1/27/86

From (Your Name)

Your Phone Number (Very Important)

To (Recipient's Name)

Recipient's Phone Number (Very Important)

Stephen O'Reilly

(201) 922-6767

Ms. Janet G. Veldstein

Company

Department/Floor No.

Company

Department/Floor No.

SCIENTIFIC INC

Environmental Engineer
N.J. Invest. & Compl., E.P.A. - Region II

Street Address

1703 EAST 2ND ST

Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result in Extra Charge.)

26 Federal Plaza

City

State

SCOTCH PLAINS

NJ

City

State

New York

N.Y.

AIRBILL NO.

058726205

ZIP * Zip Code Required For Correct Invoicing

07076

ZIP Street Address Zip Required (No P.O. Box Zip Code)

10276

YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)

HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS STATION:
Street Address (See Service Guide or Call 800-238-5355)

Federal Express Use

PAYMENT

Bill Shipper

☐ Bill Recipient's FedEx Acct. No.
Fill in line below☐ Bill 3rd Party FedEx Acct. No.
Fill in line below☐ Bill Credit Card
Fill in line below☐ Cash

FedEx Acct. No. or Major Credit Card No.

City

State

Base Charges

Declared Value Charge

Origin Agent Charge

Total Charges

4 SERVICES
CHECK ONE BOXDELIVERY AND SPECIAL HANDLING
CHECK SERVICES REQUIRED

PACKAGES WEIGHT YOUR DECLARED VALUE OVER SIZE

ZIP * Zip Code of Street Address Required

Emp. No.

Date

☐ Cash Received☐ Return Shipment☐ Third Party☐ Chg. To Del.☐ Chg. To Hold

Street Address

Other

City

State

Zip

Received By:

X

Date/Time Received

FedEx Employee Number

PART

#2041738901

FEC-S-751-1000

REVISION DATE

2/85 PRINTED U.S.A. NCR

1 ☐ PRIORITY 1
Overnight Delivery
Using Your Packaging
(Our Packaging) 9" x 12"6 ☐ OVERNIGHT
LETTER
(Our Packaging) 9" x 12"OVERNIGHT DELIVERY
USING OUR PACKAGING2 ☐ Courier-Pak Overnight Envelope
12" x 15 1/2"3 ☐ Overnight Box
12 1/4" x 17 1/2" x 3"4 ☐ Overnight Tube
38" x 6" x 6"5 ☐ STANDARD AIR
Delivery not later than
second business day

SERVICE COMMITMENT

PRIORITY 1 - Delivery is scheduled early next business morning
in most locations. It may take two or more business days if the
destination is outside our primary service areas.
STANDARD AIR - Delivery is generally next business day or not
later than second business day. It may take three or more business
days if the destination is outside our primary service areas.1 ☐ HOLD FOR PICK-UP Give the Federal Express
address where you want package held in
Section II at right.2 ☐ DELIVER WEEKDAY3 ☐ DELIVER SATURDAY (Extra charge applies)4 ☐ RESTRICTED ARTICLES SERVICE (P-1 and
Standard Air Packages only. Extra charge applies.)5 ☐ CONSTANT SURVEILLANCE SERVICE (CSS)
(Extra charge applies.)6 ☐ DRY ICE _____ Lbs.7 ☐ OTHER SPECIAL SERVICE _____

8 _____

9 ☐ SATURDAY PICK-UP OR SATURDAY DROP-OFF
(Extra charge applies.)Received At
Shipper's Door
Regular Stop
On-Call Stop
☐ FedEx Loc.

Federal Express Corp. Employee No.

Date/Time For Federal Express Use

31352
7127

RECIPIENT'S COPY